



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

**Central District Office**

TELE: (614) 728-3778 FAX: (614) 728-3898  
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**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

January 29, 2010

Mr. Gilbert Mayo, V.P. Operations  
STAHL – a Scott Fetzer company  
3201 W. Old Lincoln Way  
Wooster, OH 44691

**Re: STAHL – a Scott Fetzer company  
OHD004287355  
Morrow County  
Partial Return to Compliance**

Dear Mr. Mayo:

By correspondence dated December 23 and December 28, 2009, STAHL – a Scott Fetzer company (Stahl) submitted to the Division of Hazardous Waste Management (DHWM) a response to the November 24, 2009 notice of violation (NOV). On January 13, 2010, DHWM conducted a follow-up inspection at the facility. Ohio EPA's Division of Surface Water (DSW) also completed an inspection on this day and has responded under separate correspondence dated January 14, 2010. This Stahl facility is located at 201 Cunnard Street in Cardington, Ohio, Morrow County. Stahl was represented by Mr. Todd Hughes while Greg Sanders, DSW and I represented Ohio EPA.

Documentation submitted included, but may not be limited to, the following: (a) copy of a letter from Todd Stout, Stout Water Systems regarding a wash water recycling system; (b) wash water analytical report for zinc; (c) compliance assurance processes for hazardous waste satellite container management; and (d) hazardous waste generator annual report compliance assurance process. Also included was a description regarding the management of lamps, batteries, and ballasts.

During the follow-up inspection, it was reported that a small on-site wash water treatment system had been set up in the new building and any wash waters generated at the facility were collected in totes and put through this system. Upon review, this treatment system did not appear to have been in operation any recent time. When the wash water collection system in the old building was reviewed, the drain lines were found to be releasing water to the sanitary sewer system, bypassing the collection tote and treatment system. Stahl does not have an approved indirect discharge permit and/or permission from the City of Cardington to discharge to their sanitary system. At this time, Stahl was told to change the flow of the waste water from the sewer system into the collection tote and not to release this waste wash water anymore, unless properly approved and/or permitted.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korteski, Director

Based upon review of the documentation submitted and on the findings from the follow-up inspection, it has been determined that Stahl has adequately abated the following violations of Ohio Administrative Code (OAC) rules cited in the November 24, 2009 NOV:

2. **OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste;**
3. **OAC Rule 3745-66-73(A), Management of Containers; and**
4. **OAC Rule 3745-52-41, Annual Report.**

Stahl remains in violation of at least the following OAC rule:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must determine if that waste is a hazardous waste. The generator may use analytical testing, generator knowledge, and/or a combination of analytical testing applied with generator knowledge.

At the time of the initial inspection, no information regarding the content of the wash water generated from the *Fremont Cleaning Systems* and subsequent management/disposal of the waste wash water could be provided. Stahl then provided a laboratory report for waste wash water analysis for zinc by EPA 200 series methods.

This waste stream would require a metals analysis and a pH analysis to determine if the waste water is a hazardous waste. The hazardous waste associated analytical method required for metals analysis (except mercury) is the toxicity characteristic leaching procedure (TCLP) and is normally completed by application of prep method 1311 followed by analytical method 6010. The pH analysis should be completed by analytical method 9040. These analytical test methods must be prescriptively followed as written with no variations. Documentation necessary for completion of a Tier 1 data validation should be submitted with the analytical results.

Stahl must provide a waste determination regarding this wash water in conjunction with the management and/or disposal methods to be used (i.e., on-site treatment and release to the sanitary sewers or on-site treatment/storage followed by off-site disposal). Based on this waste determination and subsequent waste management decision, a return to compliance or citing of additional violations will be completed. Please send your evaluation and management/disposal methods for this waste stream to my attention for review.

All requested information should be sent to my attention at the letterhead address within thirty (30) days of receipt of this letter. Upon receipt of the requested information, a hazardous waste generator status determination will be completed. After the facility's generator status has been determined, all applicable inspection checklists and Stahl's compliance with all applicable rules will be finalized.

Should you have any questions, I can be reached by telephone at 614-728-5037.

Mr. Gilbert Mayo, V.P. Operations  
STAHL – a Scott Fetzer company  
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**NOTICE:** Ohio EPA's failure to list specific violations or deficiencies in this letter does not relieve Stahl from having to comply with all applicable regulations.

Respectfully,



Randy Sheldon  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Todd Hughes, Stahl  
Kristina Durnell, DHWM, CO  
Greg Sanders, DSW, CDO  
{DHWM, CDO File }

RS/nsm prtc 10





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P.O. Box 1049  
Columbus, OH 43216-1049

January 14, 2010

Todd Hughes  
Stahl  
201 Cunard Street  
Cardington, OH 43315

**Re: Notice of Violation  
Stahl Pretreatment Inspection, Morrow County, Ohio**

Dear Mr. Hughes:

This correspondence is in regard to an inspection that Randy Sheldon and myself had with you on Wednesday, January 13, 2010, at your facility located in Cardington, Ohio. The purpose of the site visit was to discuss hazardous waste storage and the unpermitted discharge of your zinc phosphating wash water to the Village of Cardington's sanitary sewer system. During previous site inspections, your company stated that industrial wastewater (wash water) would be collected in plastic totes and hauled off-site for treatment. This letter also serves as a formal Notice of Violation for discharging industrial waste without an Indirect Discharge Permit. During the site visit, we noted the following:

1. The original wash line and pretreatment system was not in use and it did not appear to have been used in quite awhile. The discharge line was directed to the Village of Cardington's sanitary sewer system. Please see attached pictures.
2. A new wash line had been installed and the wash water was directed to the Village of Cardington's sanitary sewer system. There was no pretreatment of the wash water prior to discharge. Stahl did not contact the Village or the Ohio EPA prior to discharge of this categorical industrial wastewater. An indirect discharge permit must be obtained by the Ohio EPA prior to discharge of industrial waste to the sanitary sewer system. Changes in your process or changes in your volume of wastewater should also be discussed with the Village and Ohio EPA prior to the discharge to the sanitary sewer system. Please see attached pictures.
3. You stated that Stahl normally contains the discharge from the new wash line in plastic totes. However, the valving at the wash water sump directed the flow to the Village's sanitary sewer system. When asked to direct the flow to the plastic tote for hauling off-site, Stahl's staff had a difficult time turning the valve to direct the flow to the tote. It appeared that the valve had been in that position for a long time. Also, after the valve directed the flow to the plastic tote, wash water leaked on to the floor. The drain plug was not closed on the bottom of the plastic tote, further evidence that the plastic tote was not being utilized.

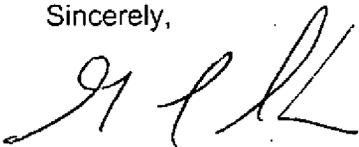
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Chris Korleski, Director

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4. When asked to review the hauling records of the wash water, you stated that the Stout Water Solutions kept the records. The records must be kept on-site. Please provide me with the last three years of hauling records.
5. You must immediately submit a complete indirect discharge permit application, which was given to you during the inspection, to the Ohio EPA. You must receive an approved indirect discharge permit from the Ohio EPA prior to discharge of your industrial waste. During the interim, you must collect your industrial wastewater.
6. You must test the pH of your collected industrial wastewater. If the pH is below 2.5 or above 12.0, it is considered a hazardous waste and must be treated as such. Please contact Randy Sheldon at (614) 728-5037 if the industrial wastewater is considered a hazardous waste.
7. A permit to install application must be submitted for the treatment of the industrial wastewater to reduce the zinc concentration in the wash water. As stated in previous correspondence, the maximum daily limit for zinc is listed as 2.61 mg/l in the metal finishing standards in 40 CFR 433.16. Previous testing of your wash water yielded zinc results of 80 to 90 mg/l.
8. During the inspection, you requested if the wash water could be collected and diluted with other water in order to meet the zinc limit. This is not a viable method of treatment to reduce your zinc concentration. Please see the attached Ohio administrative code 3745-3-09, which basically states that you cannot attempt to dilute a discharge to achieve compliance with pretreatment standards.

If you have any questions regarding this correspondence, please feel free to contact me by e-mail at: [greg.sanders@epa.state.oh.us](mailto:greg.sanders@epa.state.oh.us) or phone at (614) 728-3851.

Sincerely,



Gregory L. Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosure

c: Jeff Bohne, Ohio EPA, DSW/CDO  
Randy Sheldon, Ohio EPA, DHW/CDO  
Ryan Laake, Ohio EPA, DSW/CO  
Tom Reynolds, Village Administrator, Village of Cardington  
Paula Paben, Stahl